

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

IN RE: NEW ENGLAND COMPOUNDING
PHARMACY, INC.
PRODUCTS LIABILITY LITIGATION

v.

MDL No: 1:13-md-2419-RWZ

This Document Relates to:

1:12-cv-12112
1:13-cv-12657
1:13-cv-12659
1:13-cv-13227
1:13-cv-13228
1:14-cv-11856
1:14-cv-10284
1:14-cv-10432
1:14-cv-11224
1:14-cv-13676
1:14-cv-13689
1:15-cv-11367

**DEFENDANTS' MOTION TO JOIN SAINT THOMAS ENTITIES'
MOTION TO COMPEL INVOKING DEFENDANTS TO
PRODUCE CERTAIN DOCUMENTS AND NOTICE OF DISCOVERY**

NOW COME defendants, BKC Pain Specialists, Inc., Cincinnati Pain Management Consultants, Ltd., APAC Centers for Pain Management/Advanced Pain Anesthesia Consultants, P.C., James Molnar, M.D., Gururau Sudarshan, M.D., Anne Tuttle, M.D., Saud Siddiqui, M.D., Lori Sheets, LPN, Meena Chadha, Randolph Chang, M.D., Adil Katabay, M.D., and Nikesh Batra, M.D., and hereby move to join Saint Thomas Entities' Motion to Compel Invoking Defendants to Produce Certain Documents (docket entry 2117) electronically filed on July 30, 2015. The motion and accompanying memorandum filed by the Saint Thomas Entities fully sets forth the substantial and compelling grounds for the request for production which is fundamental

and material to the claims and defenses of the undersigned defendants and are otherwise incorporated by reference to the extent any formal joinder is deemed necessary.

Further, the undersigned defendants give notice that they join in and otherwise incorporate by reference the written discovery, including admissions, served upon the National Defendants (i.e. ARL, Bio Pharma, Inc., Liberty, Unifirst, Victory) by the Tennessee, Premier and/or Box Hill clinic defendants. Rather than propound duplicate set of requests as to common issues, the undersigned defendants rely, adopt, and expressly incorporate the requests already submitted by the other clinic defendants in this MDL as if they were separately propounded in the above-referenced actions.

Respectfully Submitted

/s/ Tory A. Weigand

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on **July 31, 2015**

/s/ Tory A. Weigand

Tory A. Weigand, BBO #548553
Anthony E. Abeln, BBO #669207
Morrison Mahoney LLP
250 Summer Street
Boston, MA 02210-1181
(617) 439-7500
tweigand@morrisonmahoney.com
aabeln@morrisonmahoney.com
attorneys for the defendants
*BKC Pain Specialists, Inc.,
Cincinnati Pain Management Consultants, Ltd.,
APAC Centers for Pain Management/Advanced Pain
Anesthesia Consultants, P.C.,
James Molnar, M.D., Gururau Sudarshan, M.D.,
Anne Tuttle, M.D., Saud Siddiqui, M.D., Lori Sheets,
LPN, Meena Chadha, Randolph Chang, M.D.,
Adil Katabay, M.D., and Nikesh Batra, M.D.*